UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK UNITED STATES OF AMERICA : 13 Cr. 368 (DLC) - v. -LIBERTY RESERVE S.A., PROTECTIVE ORDER ARTHUR BUDOVSKY, a/k/a "Arthur Belanchuk," a/k/a "Eric Paltz," VLADIMIR KATS, a/k/a "Ragnar," JUIVIENT AHMED YASSINE ABDELGHANI, a/k/a "Alex," CTRONICALLY ALLAN ESTEBAN HIDALGO JIMENEZ, : a/k/a "Allan Garcia," AZZEDDINE EL AMINE, MARK MARMILEV, a/k/a "Marko," a/k/a "Mark Halls," and MAXIM CHUKHAREV, Defendants.

DENISE L. COTE, District Judge:

WHEREAS, the Government has represented that certain materials subject to discovery in this case pursuant to Rule 16 of the Federal Rules of Criminal Procedure ("Rule 16") contain or reflect personal identification information (including but not limited to names, account numbers, social security numbers, and dates of birth); and

WHEREAS, the Government desires to protect any confidential information contained in any materials it produces pursuant to Rule 16(d)(1);

IT IS HEREBY ORDERED THAT:

- 1. Discovery material produced by the Government in this action that contains or reflects personal identification information (including but not limited to names, account numbers, social security numbers, and dates of birth) may be designated as "Confidential Material" by labeling the material "UNITED STATES GOVERNMENT CONFIDENTIAL MATERIAL."
- 2. Confidential Material disclosed to any defendant or to his counsel during the course of proceedings in this action:
- (a) Shall be used by the defendant or his counsel only for purposes of this action;
- (b) Shall not be copied or otherwise recorded by the defendant;
- (c) Shall not be distributed or disclosed in any form by the defendant or his counsel except as set forth in paragraph 2(d) below;
- (d) May be disclosed only by the defendant's
 counsel and only to the following persons (hereinafter
 "Designated Persons"):
 - (i) investigative, secretarial, clerical,
 paralegal and student personnel
 employed full-time or part-time by the
 defendant's counsel;

- (ii) independent expert witnesses,
 investigators or advisors retained by
 the defendant or on his behalf in
 connection with this action;
- (iii) fact witnesses or other third-parties
 interviewed or consulted by the
 defendant's counsel or a member of the
 defense team in the course of
 investigating the case;
- (iv) such other persons as hereafter may be
 authorized by the Court upon such
 motion by the defendant; and
- (e) Shall be returned to the Government following the conclusion of this case together with any and all copies of thereof, or shall be destroyed together with any and all copies thereof, which destruction defendant's counsel shall verify in writing.
- 3. Any defendant receiving discovery in this matter and his counsel shall provide a copy of this Order to any Designated Persons to whom Confidential Material is disclosed pursuant to paragraphs 2(d). Designated Persons shall be subject to the terms of this Order.

4. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any judge or magistrate of this Court for purposes of this action.

Dated:

New York, New York

June // , 2013

SO ORDERED:

THE HONORAPLE DENISE L. COTE UNITED STATES DISTRICT JUDGE